

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

AMAZON.COM, INC. and AMAZON DATA  
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS, et al.,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader Plaintiff /  
Intervening Interpleader Counter-  
Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC, and BW  
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Interpleader Defendants / Interpleader  
Counter-Plaintiffs.

**MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Rule 5(C) and Section 11(e) of the Protective Order entered in this case on June 4, 2020, ECF 55, Defendant Brian Watson respectfully seeks leave to file under seal the unredacted version of their Memorandum in Support of their Motion to Remove “Attorneys’ Eyes Only” Designation and Exhibit C to the Declaration of Jeffrey R. Hamlin in support of that Motion.

Pursuant to the Protective Order, Non-Party IPI Partners LLC (“IPI”) has designated Exhibit C as “Highly Confidential—Attorneys’ Eyes Only.” The Protective Order requires

discovery material designated by a party as “Highly Confidential—Attorneys’ Eyes Only” to be filed under seal. Because Watson’s Memorandum in Support of the Motion to Remove “Attorneys’ Eyes Only” Designation describes and quotes language from Exhibit C, Watson also requests leave to file it under seal.

Under Local Civil Rule 5, IPI “must file a response to [this] motion complying with [the] requirements” of Local Civil Rule 5(C)(2), (3), and (4) justifying the sealing of the materials

Dated: August 12, 2022

Respectfully submitted,

/s/ Jeffrey R. Hamlin  
Jeffrey R. Hamlin (VA Bar No. 46932)  
George R. Calhoun (*pro hac vice*)  
James Trusty (*pro hac vice*)  
IFRAH PLLC  
1717 Pennsylvania Avenue NW, Suite 650  
Washington, DC 20006  
Telephone: (202) 524-4140  
Facsimile: (202) 524-4141  
jhamlin@ifrahlaw.com  
george@ifrahlaw.com  
jtrusty@ifrahlaw.com

Stanley L. Garnett (*pro hac vice*)  
Amanda K. Houseal (*pro hac vice*)  
Sara R. Bodner (*pro hac vice*)  
Leah M. Regan-Smith (*pro hac vice*)  
Neil S. Sandhu (*pro hac vice*)  
Brownstein Hyatt Farber Schreck, LLP  
410 17<sup>th</sup> Street, Suite 2200  
Denver, CO 80202  
Telephone: (303) 223-1100  
Facsimile: (303) 223-1111  
sgarnett@bhfs.com  
ahouseal@bhfs.com  
sbodner@bhfs.com  
lregansmith@bhfs.com  
nsandhu@bhfs.com

*Counsel for WDC Holdings LLC, Brian  
Watson, Sterling NCP FF, LLC, Manassas  
NCP FF, LLC, NSIPI Administrative Manager,  
and BW Holdings LLC*